

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.: 24-03139-01/09-CR-S-BCW

RAHULKUMAR D. PATEL, et al.,

Defendants.

UNITED STATES' MOTION FOR
A PROTECTIVE ORDER REGARDING DISCOVERY

The United States of America, by and through Jeffrey P. Ray, Acting United States Attorney for the Western District of Missouri, and the undersigned Assistant United States Attorney, respectfully moves the Court, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, to enter an order prohibiting the unauthorized disclosure of discovery material or information contained therein to non-litigants. In support of this motion, the United States asserts:

1. Defendants Rahulkumar D. Patel, Manishkumar M. Patel, Mitulkumar M. Barot, Sunilkumar N. Patel, Tushar R. Patel, Azghar Ali, Harshadkumar S. Chaudhari, Vipul A. Patel, and Mohammed Iphtekhar Ali Ajgar are charged in a multi-count indictment in the instant case.
2. The discovery materials in this case contain, among other things, private financial information, including bank records relating to numerous individuals and entities, and other private information, including social security numbers, addresses, and birth dates.
3. The United States will follow all requirements of Rule 16 of the Federal Rules of Criminal Procedure and will follow the requirements of 18 U.S.C. § 3500 but would like to ensure that each defendant is informed about the limitations of Federal Rule of Criminal Procedure 6(e)

regarding grand jury transcripts and the appropriate legal purposes for which certain discovery may be used.

4. The United States believes that because of the nature of the discovery in this case, it is appropriate for the Court to enter a Protective Order containing the following provisions (when the term "defendant" is used, said term encompasses an attorney for the defendant):

a. Many of the materials to be provided as discovery (hereinafter "discovery materials"), which will be produced by the United States in preparation for or in connection with any stage of the proceedings in this case, including, but not limited to, personal identification information, investigators or agency memoranda or reports, witness statements, applications, computer or electronic records, reports of investigation, bank and credit card records, recordings and summaries of conversations, and any documents and tangible objects provided by the United States other than trial exhibits (i.e., items actually admitted during the trial and made part of the record), are not public information. Accordingly, these discovery materials and all copies thereof should be protected from unnecessary dissemination.

b. Such discovery materials provided by the United States should be utilized by each defendant solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding.

c. Such discovery materials and their contents, and any notes or other record of such materials or their contents, should not be disclosed either directly or indirectly to any person or entity other than the respective defendant and defendant's counsel, persons employed to assist in the defense, individuals who are interviewed as potential witnesses in the case, or such other persons as to whom the Court may authorize disclosure.

d. Such discovery materials should not be copied or reproduced except as necessary to provide copies of the material for use by an authorized person as described above to prepare or assist in the defense, and all such copies and reproductions will be treated in the same manner as the original matter.

e. Each defendant's counsel should inform their client of the provisions of the Protective Order and direct him not to disclose or use any information contained in the United States' discovery in violation of the Protective Order. However, nothing contained in the Protective Order will preclude any party from applying to the Court for further relief or for modification of any provision herein.

5. The United States has conferred with counsel for Defendants Rahulkumar D. Patel, Manishkumar M. Patel, Mitulkumar M. Barot, Sunilkumar N. Patel, and Harshadkumar S. Chaudhari regarding this motion and they each do not object to the United States' motion.

WHEREFORE, the United States of America respectfully requests that the Court grant its Motion for a Protective Order Regarding Discovery.

Respectfully submitted,

Jeffrey P. Ray
Acting United States Attorney

By /s/ Casey Clark
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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was delivered on July 22, 2025, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Casey Clark

Casey Clark
Assistant United States Attorney